

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE APPLICATION OF HANWEI GUO
FOR AN ORDER TO TAKE DISCOVERY
FOR USE IN A FOREIGN PROCEEDING
PURSUANT TO 28 U.S.C. § 1782

Case No. 18 Misc. _____

**APPLICATION AND PETITION OF HANWEI GUO
FOR AN ORDER TO TAKE DISCOVERY
FOR USE IN A FOREIGN PROCEEDING PURSUANT TO 28 U.S.C. § 1782**

Petitioner Hanwei Guo, pursuant to 28 U.S.C. § 1782 and Federal Rules of Civil Procedure 26, 34, and 45, respectfully applies to this Court for an order authorizing Petitioner to obtain certain limited discovery from Deutsche Bank Securities Inc.; J.P. Morgan Securities LLC; Merrill Lynch, Pierce, Fenner & Smith Incorporated ; and Morgan Stanley & Co. LLC (collectively, the “Underwriters”) for use in a pending arbitration before the China International Economic and Trade Arbitration Commission (“CIETAC”). In support of this Application, Petitioner Hanwei Guo submits a Memorandum of Law and attaches the Declaration of Renita Sharma (the “Sharma Declaration”), the Declaration of Ruojian Chen, and the Declaration of Hanwei Guo, each with accompanying exhibits. The Proposed Order is attached as Exhibit 1 to the Sharma Declaration, and the subpoenas *duces tecum* to be served on each of the Underwriters are attached as Exhibits 2 through 5 to the Sharma Declaration.

Dated: New York, New York
December 5, 2018

Respectfully submitted,

QUINN EMANUEL URQUHART &
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/s/ Tai-Heng Cheng

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